



OFFICE OF THE ATTORNEY GENERAL
STATE OF ILLINOIS

KWAME RAOUL
ATTORNEY GENERAL

August 15, 2019

The Honorable Scott S. Harris
Clerk of the Court
Supreme Court of the United States
One First Street, N.E.
Washington, D.C. 20543

Re: *Michael N. Thomas v. Raymond Anderson, et al.*
No. 18-1424

Dear Mr. Harris:

Pursuant to Supreme Court Rule 30.4, Respondents Raymond Anderson, Richard W. Cochran, Cornealious Sanders, Scott A. Bailey, and Roger Fitchpatrick respectfully request a 31-day extension to Monday, September 30, 2019, to file its response to the petition for certiorari in the above-captioned case. On July 31, 2019, the Court directed Respondents to file a response to the petition by August 30, 2019. I have contacted counsel for Petitioner, who indicates that he has no objection to this request for a 31-day extension of time.

This extension is necessary so that I can research the issues presented by the petition and draft a response. Because I did not handle the underlying appellate proceedings—the attorney who briefed and argued the case has since left the Illinois Attorney General’s Office—I will need additional time to familiarize myself with the factual and procedural background of the case and the relevant legal issues before beginning to draft the response. In addition, I am responsible for drafting a response brief in *Reed v. Illinois*, No. 19-1164 (7th Cir.) (due Aug. 28, 2019) and an opening brief in *Rasho v. Baldwin*, Nos. 19-1145, 19-1375, & 19-1978 (cons.) (7th Cir.) (due Sept. 30, 2019), as well as preparing for and participating in oral argument in *Proft v. Raoul* (7th Cir.) (Sept. 6, 2019). And, as a supervising attorney, I devote substantial time to performing various supervisory and administrative duties, such as reviewing briefs and jurisdictional statements in numerous appeals and assisting attorneys as they prepare for oral arguments and mediations ordered pursuant to 7th Cir. R. 33.



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This is Respondents' first request for an extension of time. It is not made for purposes of delay, but so that I may meet my professional responsibilities, properly represent my clients, and provide this Court with a thorough brief in this matter.

Very truly yours,

/s/ Frank H. Bieszczat
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cc: Clifford W. Berlow, Counsel for Petitioner